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Attorney for Plaintiffs:  
PARADISO, LLC and MICHAEL WIESNER

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PARADISO, LLC and MICHAEL WIESNER, )

Plaintiffs, )

v. )

THE TRAVELERS INDEMNITY  
COMPANY OF CONNECTICUT, ET. AL., )

Defendants. )

CASE NO. C 13-1395 MEJ

**APPLICATION AND ~~PROPOSED~~ ORDER  
TO CONTINUE CASE MANAGEMENT  
CONFERENCE**

The plaintiffs in this action are PARADISO, LLC and MICHAEL WIESNER (the “Plaintiffs”). On May 31, 2013, plaintiffs served THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT and THE TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA. On June 13, 2013 plaintiffs filed a Consent to Proceed Before a United States Magistrate Judge. The plaintiffs request additional time for defendants to file a response to the complaint, for the parties to meet and confer (regarding initial disclosures, early settlement, ADR process selection and discovery plan), for the parties to complete initial disclosures and for the parties to file case management statement.

The Case Management Conference is currently scheduled for June 27, 2013 at 10:00 am, and the case management statement is scheduled to be shall be filed by June 20, 2013. Plaintiffs requests that the Court modify the Court’s order dated March 28, 2013 regarding case management matters as follows:

1           1.       The Initial Case Management Conference is continued from June 27, 2013 to August  
2 29, 2013 at 10:00 am before Magistrate Judge Maria -Elena James, in Courtroom B, 15<sup>th</sup> Floor,  
3 Federal Building, 450 Golden Gate Avenue in San Francisco, CA.

4           2.       August 22, 2013 shall be last day to file Rule 26(f) Report, complete initial  
5 disclosures and file case management statement.

6           3.       August 8, 2013, shall be last day to: (a) meet and confer re: initial disclosures, early  
7 settlement, ADR process selection and discovery plan; (b) file ADR Certification signed by Parties  
8 and Counsel; and (c) file either stipulation to ADR Process or Notice of Need for ADR Phone  
9 Conference.

10  
11 Dated: June 18, 2013.

Respectfully Submitted,  
LAW OFFICE OF JAMES FARINARO

13 By: s/JAMES FARINARO  
14 JAMES FARINARO

15 Attorney for Plaintiffs:  
16 PARADISO, LLC and MICHAEL WIESNER  
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1 The Court having considered the foregoing application finds good cause appearing.  
2 IT IS SO ORDERED that:

3 1. The Case Management Conference in this matter is hereby CONTINUED from June  
4 29, 2013 at 10:00 am to August 29, 2013 at 10:00 am before Magistrate Judge Maria-Elena James, in  
5 Courtroom B, 15<sup>th</sup> Floor, Federal Building, 450 Golden Gate Avenue in San Francisco, CA.

6 2. August 22, 2013 shall be last day to file Rule 26(f) Report, complete initial  
7 disclosures and file case management statement.

8 3. August 8, 2013, shall be last day to: (a) meet and confer re: initial disclosures, early  
9 settlement, ADR process selection and discovery plan; (b) file ADR Certification signed by Parties  
10 and Counsel; and (c) file either stipulation to ADR Process or Notice of Need for ADR Phone  
11 Conference.

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13  
14 DATED: June 20, 2013



MARIA-ELENA JAMES  
UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE

I, James Farinaro, certify and declare as follows:

I am a member of the Bar of the State of California and this Court, and my business address is 852 East 14th Street, San Leandro, California 94577. I am not a party to this action and I am over 18 years of age.

On December 20, 2012, I certify that I served the following documents:

**1. STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE;**

[ X ] (BY US MAIL) By placing a true copies of the foregoing in sealed envelope addressed as follows with postage prepaid for first-class mail and depositing the envelopes in the U.S. Postal Service at San Leandro:

Matthew D. Haley, Esq.  
THE HALEY LAW OFFICES P.C.  
1633 San Pablo Avenue  
Oakland, California 94612-1505

[ X ] (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed below.

I certify and declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 20, 2012 at San Leandro, California.

s/James Farinaro  
JAMES FARINARO